

Stephen D. Finestone (125675)  
Jennifer C. Hayes (197252)  
Kimberly S. Fineman (184433)  
Ryan A. Witthans (301432)  
FINESTONE HAYES LLP  
456 Montgomery Street, 20th Floor  
San Francisco, California 94104  
Tel. (415) 616-0466  
Fax (415) 398-2820  
jhayes@fhllawllp.com

Attorneys for Chapter 7 Trustee  
Kyle Everett

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re

BENJA INCORPORATED,

Debtor.

Case No. 20-30819-DM

Chapter 7

**DECLARATION OF JENNIFER C.  
HAYES IN SUPPORT OF  
REQUEST FOR ENTRY OF  
ORDER BY DEFAULT  
APPROVING TRUSTEE'S  
MOTION FOR ENTRY OF ORDER  
PURSUANT TO ECF 150 (PETERS  
COMPROMISE ORDER)**

I, Jennifer C. Hayes, declare as follows:

1. I am a partner at Finestone Hayes LLP, attorneys of record for Kyle Everett in his capacity as the duly appointed Chapter 7 Trustee of the bankruptcy estate of Benja Incorporated (the "Debtor") in the above-captioned case (the "Bankruptcy Case").

2. All statements in this declaration are based on my own personal knowledge and observation, or upon information and belief based upon my review of the court and business records in this case. If called to testify on this matter, I could and would competently testify to the matters set forth in this Declaration.

1 I make this Declaration in support of the concurrently filed Request for Entry of Order by  
2 Default.

3 3. On October 2, 2024, I caused to be filed the Trustee's Motion and the supporting  
4 Declarations of Kyle Everett and Stephen D. Finestone. ECF 212, 212-1, 212-2. Also on October  
5 2, 2024, I caused to be filed the Trustee's Notice and Opportunity for Hearing (the "Notice")  
6 relating to the Motion. ECF 213. The Notice was served on creditors in the Court's ECF service  
7 list on October 2, 2024, and on creditors listed on the Court's mailing matrix on October 3, 2024.  
8 ECF 213, 214.

9 4. The Notice indicated that anyone wishing to object to the proposed stipulation  
10 was required to do so by filing and serving a written objection no later than 21 days from the  
11 date on which the Notice was served. The last day for filing and serving objections was October  
12 24, 2024.

13 I declare under penalty of perjury that the above statements are true and that if called as  
14 a witness I could and would testify to their truthfulness. This declaration is executed on  
15 October 25, 2024 in Contra Costa County, California.

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17 /s/ Jennifer C. Hayes  
18 Jennifer C. Hayes  
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